

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

RUBEN ROMANO

JURY TRIAL DEMANDED

v.

CASE NO.

WILLIAMS & FUDGE, INC.

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692.
2. This Court has jurisdiction. 15 U.S.C. §1692k, 28 U.S.C. §1331.
3. Plaintiff is a natural person who resides in Allegheny County, Western District of Pennsylvania.
4. Plaintiff is a consumer within the FDCPA.
5. Plaintiff allegedly incurred a debt within the FDCPA, namely tuition owed to Duquesne University.
6. Defendant holds itself out to the public as a collection agency.
7. Defendant is a debt collector within the FDCPA.
8. Defendant's collection efforts took place within the past year.
9. Defendant contacted an unauthorized third party, namely Plaintiff's estranged father, and disclosed that plaintiff owes a debt.

FIRST COUNT

10. In the collection efforts, Defendant violated the FDCPA, *inter alia*, § 1692b(2) and 1692c(b).
11. As a result of Defendant's illegal collection activities, Plaintiff suffered actual damages in the form of anger anxiety, emotional distress, fear, frustration, upset,

humiliation, embarrassment, as well as unjustified and abusive invasions of personal privacy.

WHEREFORE, Plaintiff respectfully requests this Court to:

1. Award Plaintiff such damages as are permitted by law, including \$1,000 statutory damages; and
2. Award the Plaintiff costs of suit and reasonable attorney's fee.

Respectfully Submitted,

JEFFREY L. SUHER, P.C.

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